



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND WATERSHEDS

January 6, 2015

Ron Sather
Facilities Manager
7 Cedars Casino
270756 Highway 101
Sequim, WA 98382

Bill Laubner, Facilities Manager
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, Washington 98382

Re: Exceedance of Copper Action Level
7 Cedars Casino - PWS ID# 105300108

Dear Mr. Sather and Mr. Laubner:

As you are aware, copper results from all tap water samples collected at the 7 Cedars Casino during the months of September 2014, November 2014 and December 2014 have been extremely high. The purpose of this letter is to describe regulatory actions that must be taken as a result of these elevated copper levels.

The Lead and Copper Rule, which is one of the rules under the National Primary Drinking Water Regulations, requires public water systems to monitor for lead and copper at a specified number of taps and provide corrosion control treatment if the 90th percentile lead or copper levels exceed certain "action levels" (0.015 mg/L for lead and 1.3 mg/L for copper). The 90th percentile lead and copper levels for samples collected in September, November, and December are as follows:

Date	Lead (mg/L)	Copper (mg/L)
September 2014	0.007	7.43
November 2014	0.005	12.3
December 2014	0.002	9.92

As the regulatory copper action level of 1.3 mg/L has been exceeded each of these months, you are required to install corrosion control treatment. As per the Lead and Copper Rule, you are required to submit a corrosion control treatment recommendation to the Environmental Protection Agency by June 30, 2015, for our approval. Not doing so will result in a violation and will be brought to the attention of our Drinking Water Enforcement Officer. However, given the extremely high copper levels which could cause acute gastrointestinal symptoms such as abdominal discomfort, nausea, and vomiting in sensitive individuals, you might want to consider submitting your corrosion control treatment recommendation to us earlier than the required date.

We suggest you work with an engineer to select an appropriate corrosion control treatment option. An extremely useful document to consult is EPA's "Revised Guidance Manual for Selecting Lead and Copper Control Strategies"

(http://water.epa.gov/lawsregs/rulesregs/sdwa/lcr/upload/2003_4_24_lcmr_guidance_lcmr_control_strategies_revised.pdf) One potential cause of the elevated copper levels could be carbon dioxide entering the plumbing system from the carbonation equipment. The carbonation equipment should be inspected to determine if backflow preventers are installed at the required locations and are not malfunctioning.

The 7 Cedars Casino corrosion control treatment recommendation can be submitted to Wendy Marshall of my staff. If you have any questions, please contact Wendy at (206) 553-1890 or marshall.wendy@epa.gov.

Sincerely,

Marie Jennings, Manager
Drinking Water Unit

cc: James Earl – Indian Health Service, Tribal Utility Consultant
Craig Haugland – Indian Health Service, Senior Environmental Engineer